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 Attorney for Defendants  
 5 F.I.M. Corporation  
 Need More Sheep Co LLC.

6 UNITED STATES DISTRICT COURT  
 7 DISTRICT OF NEVADA

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9 )  
 10 CIRILO UCHARIMA ALVARADO, )  
 On Behalf of Himself and All Others )  
 11 Similarly Situated, Plaintiff, )

Case No.: 3:22-cv-00249-MMD-CLB

12 vs. )

13 WESTERN RANGE ASSOCIATION, )  
 a California non-profit corporation; )  
 14 ELLISON RANCHING COMPANY, a )  
 Nevada corporation; JOHN ESPIL )  
 15 SHEEP CO., INC., a Nevada )  
 corporation; F.I.M. CORP., a Nevada )  
 16 corporation; THE LITTLE PARIS )  
 SHEEP COMPANY, LLC, a Nevada )  
 17 limited liability company; BORDA )  
 LAND & SHEEP COMPANY, LLC, a )  
 18 Nevada limited liability company; )  
 HOLLAND RANCH, LLC, a Nevada )  
 19 limited liability company; NEED )  
 MORE SHEEP CO., LLC, a Nevada )  
 20 limited liability company; and )  
 FAULKNER LAND AND )  
 21 LIVESTOCK COMPANY, INC., an )  
 Idaho corporation; Defendants. )  
 22 \_\_\_\_\_ )

STIPULATION AND ORDER (1) TO  
 SET ASIDE ENTRY OF DEFAULT  
 AGAINST FAULKNER LAND AND  
 LIVESTOCK COMPANY, INC., AND  
 (2) TO EXTEND FAULKNER LAND  
 AND LIVESTOCK'S TIME TO  
 RESPOND TO PLAINTIFF'S FIRST  
 AMENDED COMPLAINT (FIRST  
 REQUEST)

23 Plaintiff CIRILO UCHARIMA ALVARADO ("Plaintiff"), by and through  
 24 his counsel of record, YAMAN SALAH, ESQ. of EDELSON, P.C. and Defendant  
 25 FAULKNER LAND AND LIVESTOCK COMPANY, INC. ("Faulkner"), by and  
 26 through its counsel of record, JERRY M. SNYDER of JERRY SNYDER LAW,  
 27  
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1 hereby stipulate, and request this Court: (1) to set aside the default entered  
 2 against Faulkner on July 18, 2023, and (2) to grant Faulkner leave to respond to  
 3 the First Amended Complaint by August 10, 2023. Faulkner's response to  
 4 Plaintiff's First Amended Complaint was due on July 12, 2023. Faulkner's long  
 5 time attorney had recently retired, and while she stated that she would assist  
 6 Faulkner in finding new counsel, she did not do so in a timely manner. Jerry  
 7 Snyder, a sole practitioner, was not engaged until default had already been  
 8 entered. Given the complexity of the issues involved, the procedural history of the  
 9 case, and counsel's case load, more time is required to frame a response to the  
 10 Complaint. The undersigned parties stipulate and request that this Court set  
 11 aside the default and allow Faulkner to file its response to the First Amended  
 12 Complaint by August 10, 2023. This stipulation does not affect the deadlines that  
 13 are currently in place for Defendants that are not a party to this stipulation.

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 17 This Stipulation was prepared by counsel for Faulkner with the consent of  
 18 Plaintiff and is made in good faith and not for purposes of delay.

19 Dated: July 21, 2023

20  
 21 /s/ Jerry M. Snyder  
 22 Jerry M. Snyder  
 23 Jerry Snyder Law  
 24 Nevada State Bar No. 6830  
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 26 Reno, Nevada 89509  
 27 Jerry@Jerrysnyderlaw.com  
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 Attorney for F.I.M. Corp, Inc.  
 Need More Sheep Co., LLC

/s. Yaman Salahi  
 YAMAN SALAHI, ESQ (*pro hac vice*)  
 150 California St., 18<sup>th</sup> Floor, #821  
 San Francisco, CA 94111  
 Counsel for Plaintiff and Putative Class

**ORDER**

**IT IS SO ORDERED**

Dated this 1st Day of August 2023

A handwritten signature in blue ink, consisting of a large, stylized 'N' followed by a circular flourish and a horizontal line extending to the right.

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U.S. District Judge

**CERTIFICATE OF SERVICE**

On July 21, 2023, I electronically transmitted the attached documents to the Clerk's office and served all parties via the CM-ECF system.

July 17, 2023

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Jerry Snyder